

EXHIBIT A

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

AMERICAN ASSOCIATION OF UNIVERSITY
PROFESSORS, ET AL.,

Plaintiffs,

Case No. 1:25-cv-10685 (WGY)

v.

MARCO RUBIO, ET AL.,

Defendants.

DECLARATION OF XIANGNONG WANG

I, Xiangnong Wang, declare as follows:

1. I am a licensed attorney in good standing in the state of New York. I represent Plaintiffs in the above-captioned case and have been admitted *pro hac vice* to this court.
2. I submit this declaration in support of Plaintiffs' Motion for Protective Order Barring Retaliation and Restricting Defendants' Use of Information Disclosed in the Course of Litigation.
3. Over the past several weeks, I have participated in discussions with noncitizens who are considering whether to serve as witnesses in the above-captioned case. In nearly all of these conversations, prospective noncitizen witnesses have expressed concern that, if they testify at trial or are identified as witnesses in this case, Defendants will retaliate against them by arresting, detaining, or deporting them; denying them reentry into the United States; revoking their visas; adjusting their legal permanent resident status; denying their pending or future naturalization applications; or otherwise taking some adverse immigration action against them. Several of the prospective noncitizen witnesses I have spoken with indicated that an order barring this retaliation and restricting Defendants' use of information disclosed in the course of litigation would mitigate

those fears of retaliation. I understand that some prospective noncitizen witnesses have already declined to testify because they fear government retaliation.

4. I relay these discussions at a high level of generality because some prospective noncitizen witnesses have expressed concern that even being identified in connection with this case will subject them to government retaliation.

5. In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the forgoing is true and correct to the best of my knowledge.

June 4, 2025
New York, New York

Respectfully submitted,


Xiangnong Wang

Counsel for Plaintiffs